

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

STMICROELECTRONICS, INC.,	§
	§
Movant	§ MISC. ACTION NO. 3:15-mc-00129-D-
	§ BF
v.	§
SAMSUNG ELECTRONICS CO., LTD., ET AL.	§ Related Case No. 3:15-mc-00095-D-BF
	§
Respondents	§
	§

**JOINT MOTION FOR REVISED BRIEFING SCHEDULE FOR
MOVANT'S MOTION FOR PROTECTION**

Movant STMicroelectronics, Inc.'s ("STMicro") and Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively "Samsung") respectfully request that the Court extend the briefing deadlines relating to STMicro's Motion for Protection (Dkt. No. 1). In support, the parties state the following:

1. On November 23, 2015, STMicro filed a Motion for Protection. (Dkt No. 1). The parties are working to resolve the issues relating to Samsung's document subpoena which are set forth in STMicro's motion and which are the only remaining issues between the parties.
2. On December 14, 2015, this Court granted the parties' first joint motion for a revised briefing schedule and moved the deadline for Samsung's response from December 14, 2015 to December 23, 2015, and for STMicro's reply from December 28, 2015 to January 6, 2016.

3. On December 24, 2015, this Court granted the parties' second joint motion for a revised briefing schedule and moved the deadline for Samsung's response from December 23, 2015 to January 6, 2016, and for STMicro's reply from January 6, 2016 to January 20, 2016.

4. Samsung received STMicro's last production of documents on December 23, 2015. STMicro intends to make an additional production of certain license agreements subject to its confidentiality and notice provisions concerning same.

5. To give the parties additional time to finalize a letter agreement fully resolving STMicro's discovery obligations to Samsung, Samsung and STMicro jointly request an additional extension on the briefing schedule. The parties respectfully request the Court provide Samsung until January 22, 2016 to file its response, and to provide STMicro until February 5, 2016 to file its reply.

Dated: January 6, 2016

Respectfully submitted,

/s/ Christopher W. Kennerly

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COUNSEL FOR DEFENDANTS SAMSUNG
ELECTRONICS CO., LTD., and SAMSUNG
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Dated: January 6, 2016

Respectfully submitted,

/s/ Giana M. Ortiz

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INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Motion to Extend Deadlines has been forwarded via CM/ECF to all counsel of record on this 6th day of January, 2016.

/s/ *Christopher W. Kennerly*
Christopher W. Kennerly

CERTIFICATE OF CONFERENCE

Movant and Defendants are jointly filing this motion, and thus it is unopposed.

/s/ *Christopher W. Kennerly*
Christopher W. Kennerly